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To: Taskforcecomments
Cc: Bo Holland
Subject: Comments for the Identity Theft Task Force

Debix did a study on the effectiveness of the 90 day fraud alert. In our study we found a significant failure rate when one credit bureau is called and is to inform the other two bureaus the fraud alert is set. The FTC currently recommends that consumers only call one credit bureau. The root cause of this propagation problem comes from inconsistencies in the data across all three credit bureaus and is a problem the credit bureaus have been trying to fix for years.

Debix worked with several industry experts in the identity theft space to craft consumer tips (http://www.debix.com/consumer_tips.htm) on how to effectively set 90 day fraud alerts. In every single instance all the industry experts have always advised their consumers that they must call each of the three credit bureaus directly, despite what the prompts say at the credit bureaus and despite the FTC's recommendations.

Here is a link to the key findings of the Debix Research:
http://www.debix.com/key_findings.htm

Here is a link to the actual Debix Research:
http://www.debix.com/docs/Debix_Fraud_Alert_Research_Report_082006.pdf

Here is a link to the Consumer Tips Debix crafted with industry experts on how to effectively set fraud alerts: http://www.debix.com/consumer_tips.htm

The FTC should change their recommendation to set the fraud alert directly with all three credit bureaus. Debix has continued to measure over time the effectiveness of propagation and it has not improved. It is a consistent and on-going problem, the easy solution is for the consumer to call all three credit bureaus.

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